

Mimbres

Communications

24 July, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
RE: GN Docket No. 12-354, RM-11778 and RM-11789

We would like to voice our strong disapproval of the CTIA and T-Mobile petitions that have been submitted regarding possible rule changes to the CBRS bands.

Mimbres Communications is a fixed wireless service provider serving rural Grant County, New Mexico.

Two plus years of work by multiple parties have gone into the Part 96 rulemaking process. The innovative three-tiered access scheme is viewed by both US operators and the regulatory agencies in other countries as a model for expanding spectrum availability in a range of lightly-utilized frequency bands. These two petitions seek to negate the bulk of that effort and turn the innovative CBRS band into "just another cellular band," licensed in a manner which effectively prevents small operators from delivering service to unserved (or under-served) customers.

The request to change from Census Tract licensing to PEA's is particularly problematic. Our county has less than 30,000 residents, perhaps 5,000 of whom are either unserved or under-served. Should these proposed changes be adopted, we would have to bid on two different PEA's covering thousands of square miles and a population of over 174,000 in order to be able to offer fast, reliable service to the residents of rural Grant County.

The proposed change to ten year licenses covering the entire band and the increased limit of 50 MHz per carrier would allow three large carriers to control the entire band in a PEA. This will deprive small operators of the ability to acquire licenses, would encourage spectrum squatting, and will delay the availability of broadband service to sparsely-populated portions of America.

CBRS spectrum is a valuable tool that will allow us to do the job that the large broadband companies have not been able to do. We live here, we work here, and we have community relationships the large carriers are simply incapable of maintaining in rural areas. We hope that you will keep this in mind as you put together the NPRM.

Thank you;



Kurt Albershardt
Managing Member
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Silver City, New Mexico